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January 28, 2013

Christy D. Jones
Donna B. Jacobs
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PO Box 6010
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Dear Christy and Donna:

I hope you are doing well. Please accept this email as plaintiffs' request for depositions and custodial files for the following witnesses:

Thomas Barbolt
Julie Bird
Price St. Hilaire
Pat Beach
Gregory Jones
Martin Weisberg
Axel Arnaud
Matt Henderson
Joerg Holste
Raimo Sump

Kevin Mahar
Paul Parisi
Finley, Scott
Dan Smith
Sean O'Bryan
Patricia Hojnoski
Bryan Lisa
Susan Lin
Catherine Beath

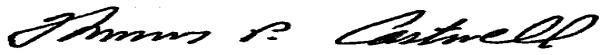
I suspect that the topics covered in these depositions will be primarily related to TTV products, but non-duplicative examination related to POP products may be involved as well. Please provide us dates for the depositions of the above-mentioned Ethicon/J&J witnesses at your earliest convenience. We would appreciate it if you could provide two or three workable dates for each witness in order to aid in scheduling. We would like to take the depositions in the listed order if possible, but understand that

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there may need to be some changes to the order to accommodate the witnesses and/or the attorneys. Please also keep in mind that we need the full and complete custodial files, including personnel files, and the witness' CV, at least twenty-one (21) days before the witness' deposition.

Let us know if you have any questions or concerns about this request as soon as possible. If we need to meet and confer regarding these deposition requests, we would like to do so as soon as possible so that we can meet the Court's fast approaching discovery deadline. Thank you for your cooperation.

Very truly yours,



Thomas P. Cartmell

TPC/mg

cc: Bryan Aylstock
Renee Baggett